

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

CIVIL ACTION NO. 04-11934-GAO

NOAH GREENBERG	)
Plaintiff	)
	)
v.	)
	)
TOWN OF FALMOUTH,	)
AND GANNETT	)
FLEMING, INC.,	)
Defendants	)

**DEFENDANT GANNETT FLEMING’S MOTION FOR EXTENSION OF  
TIME FOR FILING PRE-TRIAL DISCLOSURES**

Now comes defendant and cross-plaintiff Gannett Fleming Engineers and Architects, PC (“Gannett” or “GF”), through its counsel of record, and hereby seeks a short extension of time from this Honorable Court, within which to file its pre-trial disclosures required under F.R.C.P. 26(a)(3). Under F.R.C.P. 26(a)(3), parties have “at least 30 days before trial” within which to make the required disclosures, but under U.S. District Court Local Rule 16.5(C), these disclosures are required “no later than 30 days before the date of the pre-trial conference....” Gannett requests an extension of time under Local Rule 16.5(C) until 5/19/06, which is 30 days before the trial date in this case.

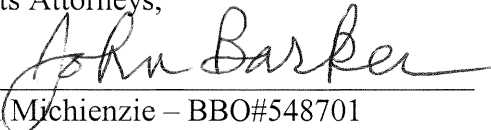
As grounds for this requested extension, Gannett’s counsel scheduled the pre-trial disclosure date 30 days before the trial date, instead of 30 days before the pre-trial conference date. Gannett’s counsel is working diligently with client representatives to prepare the pre-trial disclosures and to prepare for trial. Finally, counsel for co-defendant the Town of Falmouth does not oppose the requested extension of time for Gannett’s pre-

trial disclosures, but Gannett's counsel was unable to reach plaintiff's counsel to obtain his assent.

WHEREFORE, Gannett respectfully requests this Honorable Court's permission to file its pre-trial disclosures under Rule 26(a)(3) on or before 5/19/06, which is 30 days before the trial date in this case.

Gannett Fleming Engineers and Architects, PC ,  
By its Attorneys,

Dated: May 12, 2006

  
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